

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: Ralph Gosney

GENERAL INFORMATION:

Name:	TruSeal Technologies, Inc.
Address:	403 Treuhaft Boulevard Barbourville, KY 40906
Date application received:	5/27/2004
SIC Code/SIC description:	2891, Adhesives and Sealants
Source ID:	21-121-00004
Source A.I.:	2550
Activity ID:	APE20040001
Permit:	F-07-046

APPLICATION TYPE/PERMIT ACTIVITY:

<input type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input checked="" type="checkbox"/> Conditional major
<input type="checkbox"/> Administrative	<input type="checkbox"/> Title V
<input type="checkbox"/> Minor	<input type="checkbox"/> Synthetic minor
<input type="checkbox"/> Significant	<input checked="" type="checkbox"/> Operating
<input checked="" type="checkbox"/> Permit renewal	<input type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input checked="" type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR	<input type="checkbox"/> Not major modification per 401 KAR 51:001, 1(116)(b)	

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☒ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☐ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☐ Diagrams or drawings included
- ☒ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☐ Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual (tpy)	Potential (tpy)
PM/PM ₁₀	0.2	0.02
SO ₂	NA	NA
NO _x	NA	NA
CO	NA	NA
VOC	95	<90
Single HAPs	3	<9
Methanol	3	<9
Formaldehyde	NA	<9
Methylene diphenyl diisocyanate (MDI)	NA	5
Vinyl Acetate	NA	1
Source wide HAPs	3	<22.5

1. Actual emissions are from the Kentucky Division for Air Quality's 2005 Emissions Inventory report.

SOURCE DESCRIPTION:

TruSeal Technologies, Inc. produces adhesives and sealants for consumer applications. Primary emission units include batch mixers and a continuous mixer. After extrusion, sections of the product are cut off by hand, in a process called "slugging" and transferred for packaging.

Without federally enforceable limits, the potential to emit (as defined in 401 KAR 52:001, Section 1 (56)) of volatile organic compounds (VOC) is greater than the major source threshold of 100 tons per year. Additionally, without federally enforceable limits, the potential to emit of hazardous air pollutants (HAPs) is greater than the major source thresholds of 10 and 25 tons per year for any single HAP and the combination of HAPs, respectively.

The source was issued operating permit S-98-061 on July 31, 1998, with Revision 1 issued on January 13, 2000. Permit S-98-061 was issued pursuant to 401 KAR 50:035, which has been repealed and replaced with 401 KAR 52:020 (Title V Permits), 401 KAR 52:030 (Conditional Major Permits), and 401 KAR 52:040 (State Origin Permits). As such, S-98-061 was issued as a State Origin permit with voluntary source-wide HAP emission limits to preclude permitting requirements for major sources. During this review, the permittee has requested the continuance of federally enforceable permit limits below major source thresholds. Therefore, this permit is issued pursuant to the provisions of 401 KAR 52:030, *Federally-Enforceable Permits for Nonmajor Sources*.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

Knox County is designated as attainment for all criteria pollutants. To preclude the applicability of 401 KAR 52:020, *Title V permits*, total annual source-wide emissions shall not exceed the following specific limitations on a twelve (12) consecutive month basis:

- (a) VOC emissions: 90 tons per year;
- (b) Single HAP emissions: 9 tons per year; and
- (c) Combined HAP emissions: 22.5 tons per year.

Compliance with these limits shall also make the requirements of 40 CFR Part 63 for major sources of HAP emissions, as incorporated by reference at 401 KAR 63:002, not applicable to this source.

OPERATIONAL FLEXIBILITY:

There were no alternative operating scenarios proposed by the permittee.